

Brewster H. Jamieson, ABA No. 8411122  
Peter C. Partnow, ABA No. 7206029  
Michael B. Baylous, ABA No. 0905022  
LANE POWELL LLC  
1600 A Street, Suite 304  
Anchorage, Alaska 99501  
Telephone: 907-264-3325  
                  907-264-3317  
                  907-264-3303  
Facsimile: 907-276-2631  
Email:       jamiesonb@lanepowell.com  
              partnowp@lanepowell.com  
              baylousm@lanepowell.com  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

ELIZABETH BAKALAR,

Plaintiff,

v.

MICHAEL J. DUNLEAVY; in his individual and official capacities;  
TUCKERMAN BABCOCK; and the STATE OF ALASKA,

Defendants.

Case No. 3:19-cv-00025-JWS

**PARTIES' PROPOSED SCHEDULE  
FOR REMAINING  
PRETRIAL DEADLINES**

Counsel have conferred regarding the remaining discovery needs of this case and a schedule to accomplish it. Considering the involvement of new counsel on behalf of Plaintiff, recent addition of new legal claims, and difficulties caused by COVID-19, the Parties agree that a schedule providing flexibility is necessary. The Parties respectfully request the Court set the remaining pretrial deadlines as follows:

Discovery Motion Deadline – April 2, 2021

Dispositive Motion Deadline – April 2, 2021

Date of Completion of Discovery – May 7, 2021

Motion in Limine Deadline – May 7, 2021

CHOATE LAW FIRM LLC  
Attorneys for Plaintiff

Dated: November 12, 2020

By s/ Mark Choate (w/consent)  
Mark C. Choate, ABA No. 8011070

LANE POWELL LLC  
Attorneys for Defendants

Dated: November 12, 2020

By s/ Michael B. Baylous  
Brewster H. Jamieson, ABA No. 8411122  
Peter C. Partnow, ABA No. 7206029  
Michael B. Baylous, ABA No. 0905022

I certify that on November 12, 2020, a copy of  
the foregoing was served electronically on:

Mark Choate, mark@choatelawfirm.com [ECF]

and served via email on:  
Amanda Harber, Amanda.harber@gmail.com

s/ Michael B. Baylous

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